

CGB-CC-0456

# LIFE IN CHRIST MINISTRIES, INC.

RECEIVED & INSPECTED

FEB 22 2006

FCC - MAILROOM

February 7, 2006

Federal Communications Commission  
Attn: Office of Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Petition for exemption from closed captioning requirements for the program  
"Life in Christ" aired on PAX WPPX 61 PHILADELPHIA, Sundays at 9 a.m.

Dear Secretary,

Life In Christ Ministries, Inc. hereby petitions for exemption from closed captioning requirements, pursuant to two parts of Section 79.1 of the Commission's rules, 47 C.F.R. § 79.1.

I. Section 79.1(f)

Congress has defined "undue burden" to mean "significant difficulty or expense." We hereby request exemption from the Commission's Closed Captioning Rules in that compliance would impose an undue burden, defined in Section 79.1(f) of the Commission's rules, 47 C.F.R. § 79.1(f), as outlined below.

Difficulty & Expense to Life In Christ Ministries:

1) The nature and cost of the closed captions for programming

We have solicited captioning services from several companies and the responses to these solicitations are as follows:

Video Caption Corporation  
26 Highland Way  
Stanfordville, NY 12581  
1-800-705-1203

**Cost**  
52 half-hour programs  
\$200.00 / 30 minutes  
52 programs = **\$10,400.00**

New Day Media  
8282 S. Memorial Suite 102  
Tulsa OK, 74133  
1 (918) 250-4588

52 half-hour programs  
\$245.00 / 30 minutes  
52 programs = **\$12,740.00**  
additional \$10.00 per / \$520.00

# Life In Christ Ministries, Inc.

7201 Westfield Avenue • Pennsauken • New Jersey • 08110 • (856) 488-9070 • Fax: (856) 488-0283

CPC Computer Prompting & Captioning  
1010 Rockville Pike, Suite 306  
Rockville, MD 20852  
1-800-977-6678

52 half-hour programs  
\$450.00 / 30 minutes  
52 programs = **\$23,400.00**

VanKirk Media  
4128 W. Commonwealth Ave., #212  
Fullerton, CA 92833  
1 (818) 381-1661

52 half-hour programs  
\$300.00 / 30 minutes  
52 programs = **\$15,600.00**

Our program currently costs \$1,400.00 per 30 minute program with (PAX WPPX 61 PHILADELPHIA).

Yearly broadcasts cost \$72,800 plus \$520.00 for shipping, incurring a total of \$73,320.00 a year, not including other production costs.

In August 2005 our per program cost were \$1100.00 plus shipping. We were preempted by another program willing to pay more money and lost our program until this January 1, 2006. For additional cost of \$100.00 per program we began our programming again. At the end of December PAX informed us that our program was in jeopardy of being preempted again unless we paid an additional \$200.00. As of this writing, our current cost is \$1,400.00 per airing. There is still a possibility of someone else preempting us and another rate hike; with the added cost of closed-captioning compliance, we would have a difficult time remaining on the air.

## (2) The impact on the operation of the provider or program owner;

Currently our program editor and director has many other duties within the organization, which include network administrator, teacher, minister of music and advertising designer/coordinator. The amount of time available for editing and producing the format for broadcast is already at its limits. If we had to hire more staff or outsource any of his/her responsibilities, the increased cost would necessitate stopping the production and airing of the program.

## (3) The financial resources of the provider or program owner; and

Our financial resources are not a fixed set of resources, they are dependent upon the generosity of those who are a part of this organization and the values they keep. Unlike PBS television we don't host telethons to raise money for our broadcast. The broadcast is funded by the weekly giving of members. Some weeks we meet budget; some weeks we do not. In light of current giving trends, international, national tragedies, most charitable organizations are tightening the belt of their operational cost.

# Life In Christ Ministries, Inc.

7201 Westfield Avenue • Pennsauken • New Jersey • 08110 • (856) 488-9070 • Fax: (856) 488-0283

(4) The type of operations of the provider or program owner.

We have one computer capable of handling the editing software, plus a few volunteer camera operators who assist with the live recording of our service. The Life in Christ program consists of our Sunday service, which must be edited, finalized and delivered to PAX by Friday. Closed-captioning would only increase the turnaround time, almost making it impossible to finalize by Friday.

## II. Section 79.1 (d)(8)

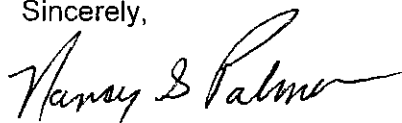
We also would like to be considered exempt under § 79.1 Closed captioning of video programming, (d) Exempt programs and providers, (8) locally produced and distributed non-news programming with no repeat value; programming that is locally produced by the video programming distributor, has no repeat value, is of local public interest, is not news programming, and for which the "electronic news room" technique of captioning is unavailable.

Our Program is aired on PAX WPPX PHILADELPHIA. Our last Nielson ratings were between 13,000 and 17,000 possible viewers. In relation to the Philadelphia broadcasting market, this is a small grasp of the market share, more along the lines of local public interest.

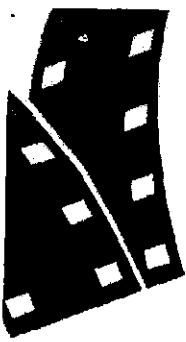
We are not a news program. The "electronic news room" technique of captioning is unavailable. Our local Public Access channel repeats many programs throughout the month which have no repeat value, other than to give others time to see their children or topics of interest. We air our program for those who cannot come to service in person, for instance those bedridden or housebound. We are not aired nationally, only being aired locally.

If you require further information, please contact David Dobbins at 856-488-9070 or via email at [dobbinsd@whcc.org](mailto:dobbinsd@whcc.org).

Sincerely,



Nancy S. Palmer  
President  
Life In Christ Ministries, Inc.



# VIDEO CAPTION CORPORATION

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DATE: January 20, 2006

TO: Bode Abodunde / Life In Christ Ministries

FROM: Justin K. Macedonia / Video Caption Corporation

RE: Closed Captioning Proposal

Dear Bode:

It was a pleasure speaking with you and having the opportunity to discuss close captioning your show. Video Caption Corporation very much appreciates the opportunity to submit this proposal to caption programming for Life In Christ Ministries.

As we discussed, Video Caption Corporation (VCC) is a full service captioning communications firm specializing in offline captioning services for broadcasters, corporations, independent producers, schools, libraries, churches, and government agencies.

VCC is proposing to close caption the following programs at the discounted rates set forth below. ***Reduced rates reflect discounts for volume and for religious programming.***

<u>Program Titles</u>	<u># Shows / Length</u>
Life In Christ	52 half-hour shows
<b>Total number of shows</b>	<b>52</b>

## Pricing

### ***Captioning Rate Breakdown:***

*Roll-up Captioning*.....\$300 / 30 minutes

### ***Reduced Rates for Life In Christ Ministries:***

*Roll-up Captioning*.....\$200 / 30 minutes

***Caption Encoding***.....Included

Bode, we will always do our very best to make this process as easy and affordable as we can. If you have any questions or concerns, please do not hesitate to contact me at any time. I will call you in a few days to follow up. I am certain we can develop a partnership that is mutually beneficial.

Thank you for your time and your consideration of our proposal. We look forward to working with you.

**Contact Information**

I am available if you have any questions about this proposal. Please contact me anytime.

Telephone: (800) 705-1203  
Facsimile: (845) 868-1188  
Email: [jkmacedonia@vicaps.com](mailto:jkmacedonia@vicaps.com)  
Website: [www.vicaps.com](http://www.vicaps.com)

Justin K. Macedonia  
Video Caption Corporation

**David Dobbins**

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**From:** bode [whtv@whcc.org]  
**Sent:** Friday, January 20, 2006 12:52 PM  
**To:** dobbins@whcc.org  
**Subject:** BodeWorldHarvest\_NJhalfhourshow[2] close caption

**Closed Captioning Quote from New Day Media**

**For Bode**

**Address: World Harvest**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Phone:** \_\_\_\_\_

**Fax:** \_\_\_\_\_

**Email: bode [whtv@whcc.org]**

**Length 28:30**

**52 weeks**

**Top left 2 line roll up**

**New Day Media, Inc. will provide transcription**

**Client will provide audio mp3 file of program before tape is sent**

**BetaSP/BetaCam to BetaSP Captioning**

**NDM will provide BetaSP tape with label**

**Shipping and Handling extra (Please provide return address and FedEx number for shipping.)**

**Rate: \$ 245.00 per program**

**Checks payable to:** New Day Media Inc.

**Mailing Address:** 8282 S. Memorial Suite 102  
Tulsa OK 74133

Phone: (918) 250-4588

Email: **kat@newdaymedia.com**

**Please fax back the Customer information attached and send us the date you expect to have the tape to us and the date you need it back. Also communicate to us how you want the label to read on the finished CC Master i.e. prog# etc.**

NDM Representative: \_\_\_\_\_

Accepted By: \_\_\_\_\_

Printed Name: \_\_\_\_\_



Computer Prompting and Captioning Co.

1-800-977-6678 | Info

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DVD

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DVD

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Video-On-Demand

## Post Production Captioning/Subtitling

*\$450.00 per show*

Click here for the Order Form

### Satisfaction Guarantee

CPC provides a free approval copy to guarantee satisfaction.

### Quality

*23,400+ years*

Top quality captioning is our highest priority. It is achieved by:

- State-of-the-art software
- Experienced, highly trained captioners
- Teamwork of captioners & software developers
- 15 years of experience
- Triple quality control

### Video Media

- **Videotape:** All formats from VHS to Digital Betacam
- **DVD:** Caption and subtitle files for most major DVD authoring systems
- **Webcast:** Video-on-Demand

### Specials

- Major discounts for bulk work
- Extreme discounts to caption Webcasts of previously captioned videos.

### Transcription & Translation

Professional Transcription and translation to most major languages available at competitive price.

### Languages

Closed & Open Captioning

### Caption/Subtitle Rate Made Simple

**Pop-on model:** \$7/min. of video + \$150 setup fee

**Roll-up model:** \$5/min. of video + \$150 setup fee

(You provide transcript & blank video)

Add \$5/min. of video if CPC transcribes

### Special Bulk Rate for VHS Tapes - \$6.00/Min

For any VHS tape over 5 hours, CPC has a great price of \$6.00/min. of video. You provide the video, we provide the video with transcript and captioning in the Roll-up mode.

### Retrieve/Convert Caption Between Different Form

Webcasting with caption  
DVD Captioning/Subtitling  
Click here for rates and details on all file formats support

### Sample Video w/ Caption

Sample Video captioned for DSL/cable users. Click here  
56k users. Click here





English, Spanish, French, Portuguese, Dutch, German and Italian

**Subtitling**

English, plus all Eastern and Western European languages. Unlimited language capability coming soon

**[Click here for to see sample subtitle fonts used for DVD, DV-2000 &](#)**

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**CPC Computer Prompting & Captioning Co.**

1010 Rockville Pike, Suite 306

Rockville, MD 20852, USA

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Phone: 301-738-8487

Fax: 301-738-8488

TTY: 301-738-8489

Toll Free: 800-977-6678

### Reach Out To Us

To find out how we can help you reach out to your audience, please contact us at

*15,600.00*  
**info@vankirk-media.com**

Or call  
**818.381.1661**  
*300.00*  
*200.00*

**VanKirk Media**  
4128 W. Commonwealth Ave., #212  
Fullerton, CA 92833

*service*  
*Jim*   
**VanKirk Media: Changing the world, one subtitle at a time. <sup>SM</sup>**

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**David Dobbins**

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**From:** WHedit [whtv@whcc.org]  
**Sent:** Friday, January 20, 2006 1:44 PM  
**To:** dobbins@whcc.org  
**Subject:** Fwd: Closed Captioning Proposal - Video Caption Corp.

Begin forwarded message:

**From:** "Justin K. Macedonia" <jkmacedonia@vicaps.com>  
**Date:** Fri Jan 20, 2006 1:31:28 PM US/Eastern  
**To:** <whtv@whcc.org>  
**Subject:** Closed Captioning Proposal - Video Caption Corp.

Dear Bode,

It was a pleasure speaking with you earlier today. Attached is our proposal to provide captioning services for Life In Christ Ministries.

I appreciate your asking us to submit pricing for your programming and I'm sure that you will find our rates to be very competitive.

Please do not hesitate to call me with any questions or comments that you may have regarding this proposal.

I can promise you that we will make this a very simple process for you and your staff.

Thank you for your time and your consideration of our proposal. We look forward to working with you.

Sincerely,

Justin Macedonia

1/20/2006

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Justin K. Macedonia

Video Caption Corporation

800-705-1203 (phone)

800-705-1207 (fax)

[jkmacedonia@vicaps.com](mailto:jkmacedonia@vicaps.com) (email)

[www.vicaps.com](http://www.vicaps.com)